

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

YANPING WANG,

Defendant.

23 Cr. 118-3 (AT)

**DECLARATION OF BRENDAN F. QUIGLEY IN SUPPORT OF  
DEFENDANT’S MOTIONS *IN LIMINE***

I, Brendan F. Quigley, declare pursuant to 28 U.S.C. § 1746 and state as follows:

1. I am a partner at the law firm Baker Botts, L.L.P. and counsel for defendant Yanping Wang (“Defendant”) in this action. I submit this declaration upon my personal knowledge in support of Ms. Wang’s motions *in limine*.

2. Attached hereto as Exhibit A is a copy of GTV Media Group, Inc.’s Confidential Information Memorandum, dated April 20, 2020 and is filed under seal.

3. Attached hereto as Exhibit B is copy of the Dates for Transfers Alleged in S2 Indictment.

4. Attached hereto as Exhibit C is copy of the April 24, 2021 hearing transcript from *United States v. Shapiro et al*, No. 15-cr-155 (RNC) (D. Conn., ECF No. 372).

5. Attached hereto as Exhibit D is copy of Defendant’s 2020 W-2 and Earnings Summary and is filed under seal and is filed under seal.

6. Attached hereto as Exhibit E is copy of Defendant’s 2019 W-2 and Earnings Summary and is filed under seal.

7. Attached hereto as Exhibit F is a copy of the [REDACTED]

[REDACTED]

[REDACTED] and is filed under seal.

8. Attached hereto as Exhibit G is a copy of the [REDACTED]

[REDACTED] and is filed under seal.

Executed in New York, New York on this 9<sup>th</sup> day of April, 2024.

/s/ Brendan F. Quigley  
Brendan F. Quigley